

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**Docket No. 2018-320-E**

In re:	)	
Joint Application of Duke Energy	)	
Carolinas, LLC and Duke Energy	)	
Progress, LLC to Establish Green	)	<b>PETITION TO INTERVENE</b>
Source Advantage Programs and	)	<b>OF JOHNSON DEVELOPMENT</b>
Riders GSA	)	<b>ASSOCIATES, INC.</b>

**Petition to Intervene of Johnson Development Associates, Inc.**

Johnson Development Associates, Inc. (“JDA”), in accordance with SC Code Regs. 103-825, submits this petition to intervene in the subject docketed proceeding. In support of this petition, JDA provides the following:

1. On October 10, 2018, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, “Companies”), files a joint application for approval to establish a Green Source Advantage Program (“GSA Program”) and Rider GSA tariff (“Joint Application”). The Joint Application was filed pursuant to S.C. Code Ann. § 58-27-820 and prior to the enactment of Act No. 62, South Carolina’s Energy Freedom Act (“The Act”).
2. On June 11, 2019, the Public Service Commission of South Carolina (“Commission”) opened Docket Nos. 2019-207-E and 2019-208-E in accordance with The Act and as applicable to the Companies’ Voluntary renewable Energy Programs. Petitioner was granted intervention in those dockets and seeks the same here.
3. The Commission has not yet established a procedural schedule for this application. As such, JDA’s petition is timely filed.

4. JDA is a South Carolina Corporation, founded in 1986 and headquartered at 100 Dunbar Street, Spartanburg, South Carolina, 29306. JDA is a multi-division developer of industrial, multi-family, self-storage, renewable energy, and commercial projects.
5. JDA has a direct and substantial interest in the outcome of this proceeding, and will be directly affected by the discussion and resolution of the topics covered therein. JDA's position and market presence relates directly to the details of this proceeding concerning the Companies. JDA has or will have qualifying facilities under development or positioned in the Companies' interconnection queue that will be impacted by the decisions this Commission makes regarding the implementation of the Companies' Voluntary Renewable Program and potential implementation of the GSA program, as well as other decisions and conditions this Commission finds necessary to implement the provisions of the Act as it relates to the Companies' GSA filing. JDA has a substantial and specific economic interest in the implementation of the Act as it relates to supplying renewable energy to commercial and industrial customers as JDA currently develops renewable energy projects in South Carolina. JDA's interest in this proceeding cannot be adequately represented or protected by any other party.
6. Pursuant to SC Code Regs. 103-804(T), JDA is represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 9th day of March, 2020.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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